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Attorneys for General Motors LLC

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11
	:
MOTORS LIQUIDATION COMPANY, et al.,	: Case No.: 09-50026 (MG)
f/k/a General Motors Corp., et al.	:
	:
Debtors.	: (Jointly Administered)
	:
-----X	

**GENERAL MOTORS LLC’S COUNTER-DESIGNATION
OF ADDITIONAL ITEMS TO BE INCLUDED IN THE RECORD
ON APPEAL REGARDING THE APPEAL OF THE
BANKRUPTCY COURT’S OCTOBER 18, 2017 OPINION [ECF NO. 14133]**

Pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure, General Motors LLC (“**New GM**”) submits this counter-designation of additional items to be included in the record on appeal in connection with the appeal of the *Memorandum Opinion and Order Denying Roger Dean Gillispie’s Motion for Leave to Pursue Claims Against General Motors LLC, and, Alternatively, to File a Post-Bar-Date Proof of Claim in the Motors Liquidation Company Bankruptcy*, entered by the United States Bankruptcy Court for the Southern District of New

York in the above-referenced case on October 18, 2017 [ECF No. 14133] (“**October 2017 Opinion**”).

COUNTER-DESIGNATION OF RECORD

In addition to the items (including any exhibit, annex, appendix or addendum thereto) designated by Appellant in his *Designation of Items to be Included in the Record on Appeal and a Statement of Issues to be Presented* [ECF No. 14163] (“**Appellant’s Designation**”), New GM submits the following designation of additional items to be included in the record on appeal of the October 2017 Opinion (including any exhibit, annex, appendix or addendum thereto):

<u>Item No.</u>	<u>Date Filed</u>	<u>Description</u>	<u>Docket No.</u>
1.	9/12/2014	Reply by General Motors LLC to Response by Wilmington Trust Company to the Gillispie Motion for Leave to Pursue Claims Against General Motors LLC, and, Alternatively, to File a Post-Bar-Date Proof of Claim in the Motors Liquidation Company Bankruptcy.	12892 ¹

Dated: New York, New York
December 4, 2017

Respectfully submitted,

/s/ Arthur Steinberg
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-and-

¹ While New GM’s reply brief is designated in Appellant’s Designation, Appellant incorrectly listed the bankruptcy docket number for this pleading (*i.e.*, ECF No. 12998). In order to avoid any confusion, New GM is designating its reply brief herein with the correct bankruptcy docket number (*i.e.*, ECF No. 12892).

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